

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

INA STEINER, DAVID STEINER, and
STEINER ASSOCIATES, LLC,

Plaintiffs,

v.

EBAY INC., *et al.*,

Defendants.

Civil Action No. 1:21-CV-11181-DPW

UNITED STATES' MOTION FOR PROTECTIVE ORDER

Pursuant to 28 U.S.C. § 517 and Federal Rule of Civil Procedure 26(c), the United States, through undersigned counsel, hereby respectfully moves for the entry of the attached protective order as to discovery or disclosure of information in this litigation implicating the United States Government that is in any way, either directly or indirectly, related to the Defendants' or any other individuals' relationship with the United States Government. The grounds for this motion are explained in the statement of interest and memorandum of law in support, attached hereto, as well as a supplement *ex parte, in camera* memorandum of law and two *ex parte, in camera* declarations that have been lodged with the Department of Justice's Classified Information Security Officer. Undersigned counsel certifies that, as discussed in greater detail in the United States' supporting memorandum of law, he has conferred with counsel for the parties regarding this motion. Defendant James Baugh takes no position. Defendants David Harville and Veronica Zea are not opposed. Defendants Philip Cooke, eBay, Wendy Jones, David Wenig, and Steve Wymer oppose. Counsel was unable to obtain the positions of Plaintiffs and Defendants Brian Gilbert, Steve Krystek, Stephanie Popp, Progressive F.O.R.C.E. Concepts LLC, and Stephanie Stockwell, despite using his best efforts to do so between September 21 and October 17.

Dated: October 17, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General
Civil Division

BRIGHAM J. BOWEN
Assistant Director, Federal Programs Branch

/s/ Christopher D. Edelman
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